

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MALEEHA AHMAD

and

ALISON DREITH,

*on behalf of themselves and a class of
similarly situated individuals,*

Plaintiffs,

v.

CITY OF ST. LOUIS, MISSOURI,

Defendant.

No. 4:17-cv-2455

DECLARATION OF DANA KELLY-FRANKS

I, Dana Kelly-Franks, declare as follows:

1. I am over the age of 18. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to those facts if called as a witness.
2. On September 15, 2017, I was in the area of Tucker Boulevard and Clark Avenue, participating in protests in St. Louis, Missouri, related to the public outrage over the acquittal of Jason Stockley, a former St. Louis police officer who shot and killed Anthony Smith in 2011.
3. At all times while I was at the protest, I was complying with the law.
4. I never heard the police give an order to disperse or any other warning.
5. I did not observe anyone in the area breaking the law.
6. When it appeared to me that the police were close to taking action against the peaceful protesters, I attempted to move kids out of the way to protect them.

EXHIBIT P

7. When I turned around after moving the kids out of the way, there was an officer who, without warning, sprayed me in the face with a chemical irritant and then knocked me down onto the ground with his riot shield.

8. I could not see from being sprayed and was getting stepped on. I rolled on the ground and ended up under a truck.

9. I could not breathe and started to hyperventilate.


10. I heard people around me running and screaming.

11. I heard people calling my name so I rolled out from under the truck and held up my hand so that someone could help me.

12. I suffered headaches for approximately four days after being sprayed with a chemical irritant and had bruising on my ribs from being hit with the officer's riot shield.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 28th day of September, 2017.

By: 
Dana Kelly-Franks